

**IN THE UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF MISSOURI
ST. JOSEPH DIVISION**

IN RE:

CASE NO.: 19-50510-btf13
Chapter 13

Blanche Michelle Lias

Debtor

**RESPONSE TO DEBTOR’S OBJECTION TO U.S. BANK NATIONAL
ASSOCIATION’S NOTICE OF MORTGAGE PAYMENT CHANGE**

Comes now U.S. Bank National Association, not in its individual capacity but solely as trustee for RMTP Trust, Series 2021 BKM-TT (“Creditor”), for its Response to Debtor’s Objection to U.S. Bank National Association’s Notice of Mortgage Payment Change states:

1. Debtor filed a Chapter 13 bankruptcy proceeding on October 24, 2019.
2. The plan was confirmed on November 13, 2020.
3. Creditor is the holder of a secured claim in the amount of \$45,234.97, secured by the real estate located at 2825 South 23rd Street, Saint Joseph, MO 64503. Said claim was filed on November 13, 2019 (Court Claim #7-1).
4. Creditor filed a Notice of Mortgage Payment Change effective May 1, 2022 on March 14, 2022 (Docket #81) including an escrow payment of \$656.15 for both taxes and insurance.
5. Creditor is in process of filing an Amended Notice of Mortgage Payment Change.

WHEREFORE, Creditor prays the Court deny the Objection, that Creditors is allowed time to amend its Notice of Payment Change or enter into an agreed order with Debtor's office, and for all other just and proper relief that the Court deems just.

Date: October 6, 2022

Respectfully submitted,

MARINOSCI LAW GROUP, P.C.
Attorney for Secured Creditor

/s/ David V. Noyce
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ATTORNEY FOR MOVANT

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the Response to Debtor's Objection to U.S. Bank National Association's Notice of Mortgage Payment Change was filed electronically on October 6, 2022, with the United States Bankruptcy Court, and has been served electronically by the Court's CM/ECF System to the following parties

Noah J. Briles
918 Francis St.
St Joseph, MO 64501

Richard Fink
Chapter 13 Trustee
Suite 1200
2345 Grand Blvd.
Kansas City, MO 64108-2663

I certify that a true and correct copy of the Response to Debtor's Objection to U.S. Bank National Association's Notice of Mortgage Payment Change was deposited in the United States mail postage prepaid on October 6, 2022, to the following non-CM/ECF parties:

Blanche Michelle Lias
2825 South 23rd Street
Saint Joseph, MO 64503

/s/ David V. Noyce
David V. Noyce #56116